

SOLOTOFF & SOLOTOFF

ATTORNEYS AND COUNSELORS AT LAW

USDS SDNY

DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 5/28/08

P.O. BOX 4686

GREAT NECK, NEW YORK 11021

TEL: 516-466-5522

FAX: 516-466-5562

35 CLOVER DRIVE

GREAT NECK, N.Y. 11021

LSOLOTOFF@AOL.COM

MEMO ENDORSED

Via Facsimile:
(212) 805-6326.

Hon. Judge Colleen McMahon
USDC, Southern District Of New York
500 Pearl Street
New York, New York 1007

May 23, 2008

*you will have
50 pp. to*

Colleen McMahon
5/27/08

Re: Jannie Pilgrim, Giovanna Henson, Jesan Spencer, Brenda Curtis v. The McGraw Hill Companies, Inc./ Index No. Civil Action. 07-6618 (CM)(THK)

Dear Hon. Judge McMahon:

Our firm represents Plaintiffs Jannie Pilgrim ("Pilgrim"), Giovanna Henson ("Henson"), Jesan Spencer ("Spencer"), and Brenda Curtis ("Curtis") (collectively, "Plaintiffs") in the above referenced matter. The Plaintiffs bring this civil action against McGraw-Hill Companies, Inc., ("McGraw-Hill" or "Company" or "Defendant") seeking, declaratory and equitable relief, and monetary damages under 42 U.S.C §2000e et seq., (Title VII)(as amended); 42 U.S.C. §1981 et seq.; the New York State Human Rights Law, Executive Law §296 et seq. (the "NYSHRL"); and the New York City Human Rights Law, New York City Administrative Code the City of New York, Sections 8-107(a) et seq. and 8-502 et seq.; for race discrimination, harassment, retaliation and retaliation harassment in the employment context.

Plaintiffs' oppose Defendant's recent application seeking to serve four separate memoranda of law. Some of the Plaintiffs' claims are common to one or more of the Plaintiffs, and concern multiple common issues of law, witnesses and in key instances the Plaintiffs themselves. There are common patterns and practices applicable to all of the Plaintiffs as well. Some of the Plaintiffs also share common facts as to each others' claims. Moreover, there are common and overlapping documents, affidavits, and deposition testimony as was evident at the depositions. It is respectfully submitted that Defendant's application should be denied. Alternatively, if an expansion of the page limit is allowed for one memorandum of law for one filed motion, than Plaintiffs request an expansion of the page limit to respond.

Respectfully submitted

Lawrence Soltoff (LS1356)

Cc: Elise M. Bloom, Esq. (by facsimile)